

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

(1) JOSHUA FIELDS	)	
	)	
Plaintiff,	)	
	)	
v.	)	Case No. CIV-21-986-G
	)	
(1) GREAT LAKES INSURANCE SE,	)	Removed from the District Court of
(2) MJ KELLY COMPANY, and	)	Kay County, State of Oklahoma
(3) CAPSTONE ISG,	)	Case No. CJ-2021-00037
	)	
Defendants.	)	

**PLAINTIFF'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO FILE RESPONSES**

COMES NOW Plaintiff Josh Fields and pursuant to LCvR7.1(h) respectfully moves this Court for an Order extending Plaintiff's deadline to file responses to Defendant Great Lakes Insurance SE's Motions to Exclude Expert Testimony of Dereck Cassady and Russ Didlake [Doc. 39] and Motion for Summary Judgment [Doc. 40]. In support of this motion, Plaintiff states as follows:

1. Defendant's Motion to Exclude Expert Testimony of Dereck Cassady and Russ Didlake [Doc. 39] and Motion for Summary Judgment [Doc. 40] were filed with this Court on September 1, 2022.

2. Pursuant to LCvR7.1(g), Plaintiff has 21 days from the filing of those motions, or September 22, 2022, to file his responses.

3. Plaintiff has not been able to collect all evidence and testimony from relevant witnesses that he intends to include in his responses to Defendants' motions. However, Plaintiff believes this evidence and testimony can be collected and included in his responses if the response deadline is extended to October 3, 2022. The requested extension correlates with the October 3,

2022 discovery cut-off deadline in this case.

4. Plaintiff has conferred with Defendant's counsel about his request for an extension and Defendant does not oppose the request.

5. Plaintiff has not made any prior requests to extend the time for responding to Defendant's motions.

6. Allowing Plaintiff to file his responses on or before October 3, 2022 will not impact the scheduled trial or other deadlines set in this case.

For these reasons, Plaintiff respectfully requests this Court enter an Order allowing Plaintiff to respond to Defendant's Motions to Exclude Expert Testimony of Dereck Cassady and Russ Didlake [Doc. 39] and Motion for Summary Judgment [Doc. 40] on or before October 3, 2022.

Respectfully submitted,

MARTIN JEAN & JACKSON

By: s/ Scott R. Jackson  
Scott R. Jackson, OBA #17502  
P.O. Drawer 2403  
Ponca City, OK 74602  
Phone (580) 765-9967  
Fax (580) 765-5433  
sjackson@mjjlawfirm.com  
Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that on the 20<sup>th</sup> day of September 2022, I electronically transmitted the attached document to the Clerk of the Court using the ECF System for filing. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants, via email:

Doerner, Saunders, Daniel & Anderson, LLP

Sara E. Potts, OBA #32104

Emily E. Allen, OBA #33456

Michael Linscott, OBA #17266

spotts@dsda.com

eallan@dsda.com

mlinscott@dsda.com

*Attorneys for Defendants*

*Great Lakes Insurance SE*

s/ Scott R. Jackson

Scott R. Jackson